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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
	x :
TELENOR MOBILE COMMUNICATIONS AS,	
Petitioner,	•
-against-	:
J	: 07 Civ. 6929 (GEL)
STORM LLC,	707.0
Respondent,	: ECF Case
-and-	DECLARATION OF CARLO LOMBARDINI
ALTIMO HOLDINGS & INVESTMENTS LIMITED, HARDLAKE LIMITED AND ALPREN LIMITED,	•
Additional Contemnors.	:
	Y

I, CARLO LOMBARDINI, declare the following to be true:

1. I am a member of the bar of Geneva, Switzerland and a partner in the Poncet Turrettini Amaudruz Neyroud & Partners law firm, located in Geneva, Switzerland. I am also a member of the Swiss and International Bar Associations. I make this declaration at the request of Telenor Mobile Communications AS.

- 2. Upon review of the attached documents relating to the formation, dissolution, and cancellation of dissolution of EC Venture Capital S.A. ("EC Venture"), it is apparent that EC Venture has issued bearer shares which, by definition, can be transferred physically from one shareholder to another shareholder without registration or notice to third parties of a change in ownership, and that, therefore, the current shareholders of EC Venture cannot be determined from the public record or EC Venture's corporate documents.
- 3. Furthermore, the current shareholders of EC Venture are not required to attend shareholders meetings. A shareholder may instead send a person duly authorized to represent his interests to a shareholders meeting.
- 4. Under Swiss law, the dissolution of a Swiss company can only be reversed when the company's assets have not been distributed to its shareholders.
- 5. As EC Venture does not publish its accounts and current ownership of its shares is not apparent, it cannot be determined from the public record whether the cancellation of the dissolution of EC Venture was proper.
- 6. Attached hereto as Exhibit A is a true and correct copy of the articles of incorporation of EC Venture dated September 23, 1997, together with an English translation thereof.
- 7. Attached hereto as Exhibit B are true and correct copies of the minutes of Extraordinary General Meetings and Ordinary General Meetings of EC Venture's shareholders, held between 2000 and 2001, and a request for a change of EC Venture's registered address, together with English translations thereof.

- 8. Attached hereto as Exhibit C are true and correct copies of the minutes of an Extraordinary General Meeting of EC Venture's shareholders, held on September 1, 2006, and a request to the Geneva Register of Trade stating that EC Venture is dissolved and in liquidation, and that Mr. André Walkowicz, its former sole director, is now its liquidator, together with English translations thereof.
- 9. Attached hereto as Exhibit D are true and correct copies of the minutes of an Extraordinary General Meeting of EC Venture's shareholders, held on November 29, 2007, and a request to the Geneva Register of Trade stating that the shareholders' decision to dissolve EC Venture has been revoked, and that Mr. André Walkowicz is no longer the liquidator of EC Venture, but is now its sole director, together with English translations thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of January, 2008 at Geneva, Switzerland.

CARLO LOMBARDINI

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